



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/LHE/SME
F. #2016R00505

271 Cadman Plaza East
Brooklyn, New York 11201

May 11, 2017

By ECF and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017 and May 5, 2017. The government again requests reciprocal discovery from the defendants.

The government has made available at First Choice Copy ("First Choice"), for reproduction to the defendants, business records and other documents obtained by the United

States Securities and Exchange Commission (“SEC”).¹ These records include documents obtained by the SEC Enforcement Division from:

Advantage Capital Management	SEC-NY-09271-EPROD-000000693 - SEC-NY-09271-EPROD-000164462; SEC-NY-09271-EPROD-001952060 - SEC-NY-09271-EPROD-001952255
Alirt Research	SEC-NY-09271-EPROD-001311482 - SEC-NY-09271-EPROD-001314286
Alvarez & Marsal	SEC-NY-09271-EPROD-000164463 - SEC-NY-09271-EPROD-000172387; SEC-NY-09271-EPROD-000812783 - SEC-NY-09271-EPROD-000812886
Aon Benfield	SEC-NY-09271-EPROD-000172388 – SEC-NY-09271-EPROD-000187659
Apex	SEC-NY-09271-EPROD-001314287 - SEC-NY-09271-EPROD-001314330
Apple Bank for Savings	SEC-NY-09271-EPROD-001308232 - SEC-NY-09271-EPROD-001311452
Atlantic Coast Life	SEC-NY-09271-EPROD-000000001 - SEC-NY-09271-EPROD-000000692; SEC-NY-09271-EPROD-001311453 - SEC-NY-09271-EPROD-001311481; SEC-NY-09271-EPROD-001952057 - SEC-NY-09271-EPROD-001952189
B Asset Manager	SEC-NY-09271-EPROD-000187660 - SEC-NY-09271-EPROD-000750859
BancCorp South Bank	SEC-NY-09271-EPROD-001952182 - SEC-NY-09271-EPROD-001952182
Bank of America	SEC-NY-09271-EPROD-001314332 - SEC-NY-09271-EPROD-001344882;

¹ Certain of the bank records contained in this production duplicate records previously produced to you by the government in discovery in this case, including by letters dated January 23, 2017 and April 3, 2017.

	SEC-NY-09271-EPROD-001952172 - SEC-NY-09271-EPROD-001952172
Bank of New York Mellon	SEC-NY-09271-EPROD-000812763 - SEC-NY-09271-EPROD-000812782; SEC-NY-09271-EPROD-001952171 - SEC-NY-09271-EPROD-001952171
Bank of Utah	SEC-NY-09271-EPROD-001344883 - SEC-NY-09271-EPROD-001345109
BDO	SEC-NY-09271-EPROD-000750860 - SEC-NY-09271-EPROD-000807753
Brown Brothers Harriman	SEC-NY-09271-EPROD-001314331 - SEC-NY-09271-EPROD-001314331; SEC-NY-09271-EPROD-001952183 - SEC-NY-09271-EPROD-001952183
Capital One	SEC-NY-09271-EPROD-001345110 - SEC-NY-09271-EPROD-001369797; SEC-NY-09271-EPROD-001369785 - SEC-NY-09271-EPROD-001369788
Charles Schwab	SEC-NY-09271-EPROD-001564455 - SEC-NY-09271-EPROD-001564463
Citibank	SEC-NY-09271-EPROD-001369798 - SEC-NY-09271-EPROD-001378756
CNO Financial Group	SEC-NY-09271-EPROD-000812887 - SEC-NY-09271-EPROD-000828390
CohnReznick	SEC-NY-09271-EPROD-000828391 - SEC-NY-09271-EPROD-000999049
Credit Suisse	SEC-NY-09271-EPROD-000999050 - SEC-NY-09271-EPROD-000999052
Cross River Bank	SEC-NY-09271-EPROD-001378757 - SEC-NY-09271-EPROD-001447451; SEC-NY-09271-EPROD-001952185 - SEC-NY-09271-EPROD-001952185

Dechert	SEC-NY-09271-EPROD-003714334 - SEC-NY-09271-EPROD-003732417
DeGolyer & MacNaughton	SEC-NY-09271-EPROD-000999053 - SEC-NY-09271-EPROD-001035231
Dennis Corkran	SEC-NY-09271-EPROD-003739697 - SEC-NY-09271-EPROD-003743283
DTC	SEC-NY-09271-EPROD-001447452 - SEC-NY-09271-EPROD-001447739
Duff & Phelps	SEC-NY-09271-EPROD-001035232 - SEC-NY-09271-EPROD-001195409; SEC-NY-09271-EPROD-001952051 - SEC-NY-09271-EPROD-001952188
E*Trade	SEC-NY-09271-EPROD-001447854 - SEC-NY-09271-EPROD-001447892
ED&F Man Capital Markets	SEC-NY-09271-EPROD-001447740 - SEC-NY-09271-EPROD-001447853
Edward Jones	SEC-NY-09271-EPROD-001952184 - SEC-NY-09271-EPROD-001952184
Egan Jones	SEC-NY-09271-EPROD-001952266 - SEC-NY-09271-EPROD-001954229
Ernst & Young	SEC-NY-09271-EPROD-001195410 - SEC-NY-09271-EPROD-001195633
Fifth Third Bank	SEC-NY-09271-EPROD-001447893 - SEC-NY-09271-EPROD-001447956; SEC-NY-09271-EPROD-001952173- SEC-NY-09271-EPROD-001952173
First National Bank of Central Texas	SEC-NY-09271-EPROD-001954230 - SEC-NY-09271-EPROD-001955015; SEC-NY-09271-EPROD-001217311 - SEC-NY-09271-EPROD-001237343
Fund Administration	SEC-NY-09271-EPROD-001447957 - SEC-NY-09271-EPROD-001448540

Fuzion	SEC-NY-09271-EPROD-001195634 - SEC-NY-09271-EPROD-001217308
Goldman Sachs	SEC-NY-09271-EPROD-001448541 - SEC-NY-09271-EPROD-001448697
Interactive Brokers	SEC-NY-09271-EPROD-001448698 - SEC-NY-09271-EPROD-001449131
JP Morgan Chase	SEC-NY-09271-EPROD-003743284 - SEC-NY-09271-EPROD-003743602; SEC-NY-09271-EPROD-001449132 - SEC-NY-09271-EPROD-001480664
KPMG	SEC-NY-09271-EPROD-001956915 - SEC-NY-09271-EPROD-001964498; SEC-NY-09271-EPROD-001237344 - SEC-NY-09271-EPROD-001246755
Lincoln Partners Advisors	SEC-NY-09271-EPROD-001246756 - SEC-NY-09271-EPROD-001248138
M&T Bank	SEC-NY-09271-EPROD-001484720 - SEC-NY-09271-EPROD-001496087; SEC-NY-09271-EPROD-001952050
Maybank Kim Eng Securities	SEC-NY-09271-EPROD-001484712 - SEC-NY-09271-EPROD-001484717
Merrill Lynch	SEC-NY-09271-EPROD-001250771 - SEC-NY-09271-EPROD-001250789; SEC-NY-09271-EPROD-001952256 - SEC-NY-09271-EPROD-001952256
Metropolitan Bank	SEC-NY-09271-EPROD-001480665 - SEC-NY-09271-EPROD-001484711; SEC-NY-09271-EPROD-001491161 - SEC-NY-09271-EPROD-001491184
Morgan Stanley	SEC-NY-09271-EPROD-001484718 - SEC-NY-09271-EPROD-001484718
Motorists Life Insurance Company	SEC-NY-09271-EPROD-001248139 - SEC-NY-09271-EPROD-001254391

National Financial Services	SEC-NY-09271-EPROD-001496088 - SEC-NY-09271-EPROD-001496091
Netherland Sewell	SEC-NY-09271-EPROD-001254392 - SEC-NY-09271-EPROD-001308231
New York Commercial Bank	SEC-NY-09271-EPROD-003752991 - SEC-NY-09271-EPROD-003755971
New York Department of Financial Services	SEC-NY-09271-EPROD-003755972 - SEC-NY-09271-EPROD-003757872; SEC-NY-09271-EPROD-003757903 - SEC-NY-09271-EPROD-003757976; SEC-NY-09271-EPROD-003758328 - SEC-NY-09271-EPROD-003758351
Nomura Securities	SEC-NY-09271-EPROD-001496092 - SEC-NY-09271-EPROD-001501317; SEC-NY-09271-EPROD-001952257- SEC-NY-09271-EPROD-001952257
Old Mutual (Bermuda) Holdings Ltd	SEC-NY-09271-EPROD-001964499 - SEC-NY-09271-EPROD-001968325
Pennsylvania Department of Insurance	SEC-NY-09271-EPROD-001501922 - SEC-NY-09271-EPROD-001502077
Pershing	SEC-NY-09271-EPROD-001501318 - SEC-NY-09271-EPROD-001501921
Platinum Partners	SEC-NY-09271-EPROD-003714333 - SEC-NY-09271-EPROD-003732418
PNC Bank	SEC-NY-09271-EPROD-001502078 - SEC-NY-09271-EPROD-001502539
RBSM	SEC-NY-09271-EPROD-001502540 - SEC-NY-09271-EPROD-001564452
SEC Office of Compliance Inspections and Examinations	SEC-NY-09271-EPROD-001955016 - SEC-NY-09271-EPROD-003714332; SEC-NY-09271-EPROD-003758352 - SEC-NY-09271-EPROD-003791255

Senior Health Insurance Company of Pennsylvania	SEC-NY-09271-EPROD-001196040 - SEC-NY-09271-EPROD-001217310
Signature Bank	SEC-NY-09271-EPROD-003791256 - SEC-NY-09271-EPROD-003791258; SEC-NY-09271-EPROD-001564464 - SEC-NY-09271-EPROD-001700771; SEC-NY-09271-EPROD-001939060- SEC-NY-09271-EPROD-001939068
Smyser Kaplan & Veselka	SEC-NY-09271-EPROD-000807754 - SEC-NY-09271-EPROD-000812762
SS&C	SEC-NY-09271-EPROD-001939069 - SEC-NY-09271-EPROD-001941084; SEC-NY-09271-EPROD-001952049 - SEC-NY-09271-EPROD-001952049; SEC-NY-09271-EPROD-001952174 - SEC-NY-09271-EPROD-001952265
Sterling National Bank	SEC-NY-09271-EPROD-001700772 - SEC-NY-09271-EPROD-001708500
Sterling Valuation	SEC-NY-09271-EPROD-001941085 - SEC-NY-09271-EPROD-001941762
Sterne Agee	SEC-NY-09271-EPROD-001564453 - SEC-NY-09271-EPROD-001564454
Stifel Nicolaus Company	SEC-NY-09271-EPROD-001708501 - SEC-NY-09271-EPROD-001708504
TD Ameritrade	SEC-NY-09271-EPROD-001708505 - SEC-NY-09271-EPROD-001708509
TD Bank	SEC-NY-09271-EPROD-001708510 - SEC-NY-09271-EPROD-001709387
The Bermuda Monetary Authority	SEC-NY-09271-EPROD-003732419 - SEC-NY-09271-EPROD-003739696
UBS Financial Services	SEC-NY-09271-EPROD-001709388 - SEC-NY-09271-EPROD-001709391

ULICO	SEC-NY-09271-EPROD-001709392 - SEC-NY-09271-EPROD-001907198
Union Bank	SEC-NY-09271-EPROD-001907199 - SEC-NY-09271-EPROD-001909933
Valley National Bancorp	SEC-NY-09271-EPROD-001909934 - SEC-NY-09271-EPROD-001910766
Wedbush	SEC-NY-09271-EPROD-001910767 - SEC-NY-09271-EPROD-001910771
Wells Fargo	SEC-NY-09271-EPROD-001910772 - SEC-NY-09271-EPROD-001939059
White Oak Global Advisors	SEC-NY-09271-EPROD-001941763 - SEC-NY-09271-EPROD-001952048

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

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cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)